

FILED
U.S. DISTRICT COURT
DISTRICT OF NEW MEXICO
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CLERK-LAS CRUCES

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
Plaintiff,) CRIMINAL NO. 22-424 mis
vs.)
RICKY L. ROMERO, JR.,) Count 1: 18 U.S.C. § 2422(b): Coercion
Defendant.) and Enticement of a Minor;
)
) Count 2: 18 U.S.C. § 2252A(a)(2)(A):
) Receipt of Material Containing Images of
) Child Pornography.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about March 4, 2019, and continuing to on or about March 6, 2019, in Chaves County, in the District of New Mexico, and elsewhere, the defendant, **RICKY L. ROMERO, JR.**, using any facility of interstate and foreign commerce, knowingly persuaded, induced, enticed and coerced, and attempted to persuade, induce, entice, and coerce, an individual who had not attained the age of 18 years, Jane Doe, to engage in any sexual activity for which any person could be charged with a criminal offense, that being production of child pornography in violation of 18 U.S.C. § 2251(a).

In violation of 18 U.S.C. § 2422(b).

Count 2

From on or about March 4, 2019, and continuing to on or about March 6, 2019, in Chaves County, in the District of New Mexico, and elsewhere, the defendant, **RICKY L. ROMERO, JR.**, knowingly received any material that contained images and videos of child pornography, as defined in 18 U.S.C. § 2256(8)(A), involving a minor, that had been mailed and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using

material that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of 18 U.S.C. § 2252A(a)(2)(A).

FORFEITURE ALLEGATION

Upon conviction of any offense in violation of 18 U.S.C. § 2422, the defendant, **RICKY L. ROMERO, JR.**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2428, any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violation, and any property, real or personal, constituting or derived from any proceeds the defendant obtained, directly or indirectly, as a result of such violation, including, but not limited to:

- a. Apple iPhone 11, IMEI 357204092380481, S/N DNQXC436KPFP.

Upon conviction of any offense in violation of 18 U.S.C. § 2252A, the defendant, **RICKY L. ROMERO, JR.**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, any matter which contains visual depictions produced, transported, mailed, shipped, or received in violation of Chapter 110, of United States Code Title 18; any property, real or personal, constituting or traceable to gross profits, or other proceeds obtained from such offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including, but not limited to:

- a. Apple iPhone 11, IMEI 357204092380481, S/N DNQXC436KPFP.

A TRUE BILL:



Assistant United States Attorney
AOH
5/4/2021

/s/
FOREPERSON OF THE GRAND JURY